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Brian A. Glasser
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December 13, 2021

Via Email

The Honorable Michael B. Kaplan
United States Bankruptcy Court, District of New Jersey
Clarkson S. Fisher US Courthouse
402 East State Street, Courtroom #8
Trenton, NJ 08608

Re: LTL Management LLC, Case No.: 21-30589 (MBK)

Dear Judge Kaplan:

We write to the Court regarding a new discovery dispute that we ask the Court address during the omnibus hearings on December 15. The TCC has asked for the “[u]nredacted versions of all minutes and resolutions of the J&J Board previously produced in the Adversary Proceeding.” See RPD No. 59. Although the parties have met several times to confer, Debtor continues to state that it will not produce unredacted versions of the board meeting minutes on the basis that the redacted content is privileged.

Attached are the September 14, 2021 minutes, as produced by Debtor. The TCC suspects, but obviously can’t tell for sure, that the decision to move forward with the 2021 Restructuring Plan was approved by the J&J Board of Directors at this meeting. As your Honor can see, the Debtor has redacted the entirety of the minutes, apparently on the incredible basis that the entire meeting constituted the giving of legal advice. We seriously doubt it. Reporting on a state of affairs, or a decision taken by the Board, or a decision considered by the Board is not receiving legal advice. We think this Board minutes redaction is almost certainly overbroad.

As an expeditious way to resolve this issue, the TCC requests that the Court order the Debtor to produce an unredacted version of this two-page document *in camera* so the Court can determine if the content has been properly redacted on the basis of privilege or if Debtor has been overly aggressive in its shield assertion.

The Court’s guidance on this matter would inform the Debtor about the contours of an assertion of privilege the Court expects to be followed in this case.

Respectfully Submitted,



Brian A. Glasser

JOHNSON & JOHNSON
Meeting of the Board of Directors

Johnson & Johnson Riverview (Guesthouse)
And Via Zoom

September 14, 2021

A regular meeting of the Board of Directors of Johnson & Johnson was held at the Johnson & Johnson Riverview (Guesthouse) in New Brunswick, NJ, commencing at 8:30 a.m. on Tuesday, September 14, 2021. The following Directors, constituting a quorum, were present:

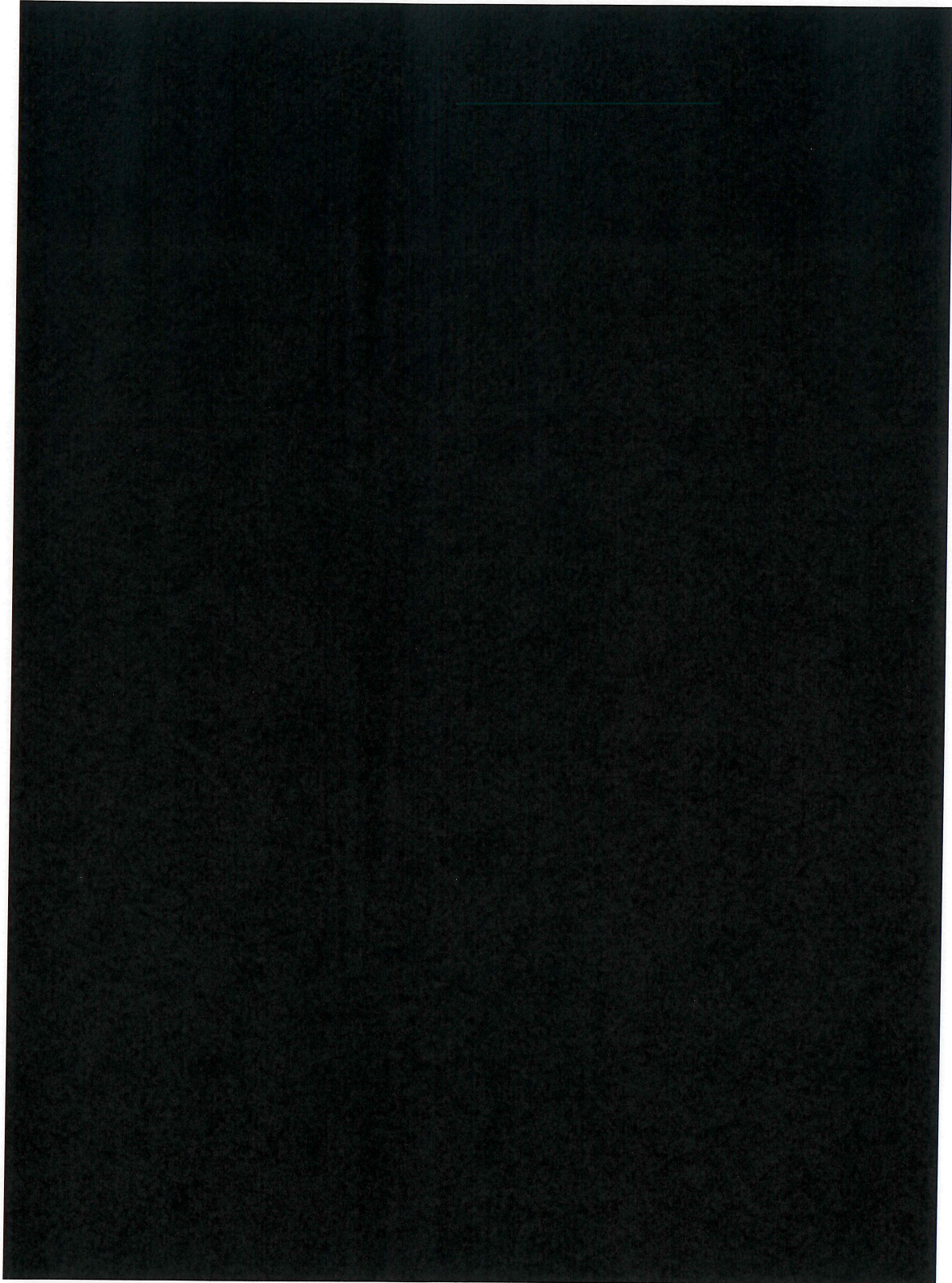
M. C. Beckerle	A. M. Mulcahy
D. S. Davis	C. O. Prince
J.A. Doudna	A. E. Washington
A. Gorsky	M. Weinberger
M. Hewson	N. West
H. Joly	R. A. Williams
M. B. McClellan	

Mr. I. E. L. Davis was joined by Zoom to the meeting.

Also present for portions of the meeting, as indicated in these minutes, were the following members of management:

P. Batesko, Vice President, Group Finance
J. Duato, Vice Chairman, Executive Committee
K. Devine, Head Enterprise Strategy
P. M. Fasolo, Executive Vice President, Chief Human Resources Officer
J. Kozak, Vice President Business Development
N. Greene, Head Enterprise Strategy
M. Mammen, Global Head, Janssen R&D
A. McEvoy, Executive Vice President, Worldwide Chairman, Medical Devices
T. Mongon, Executive Vice President, Worldwide Chairman, Consumer Health
S. Morano, Vice President Development and Strategic Operations
M. Orlando, Worldwide Vice President, Corporate Governance & Corporate Secretary
F. Pease, Vice President, Group Finance Medical Devices
P. Ruh, Chief Financial Officer, Consumer Health
P. Shen, Company Group Chairman, R&D
M. Sneed, Executive Vice President, Global Corporate Affairs
P. Stoffels, Vice Chairman, Executive Committee and Chief Scientific Officer
J. Taubert, Executive Vice President, Worldwide Chairman, Pharmaceuticals
M. H. Ullmann, Executive Vice President, General Counsel
K. Wengel, Executive Vice President, Chief Global Supply Chain Officer
J. Wolk, Executive Vice President, Chief Financial Officer

All attendees could hear and be heard throughout the duration of the meeting.

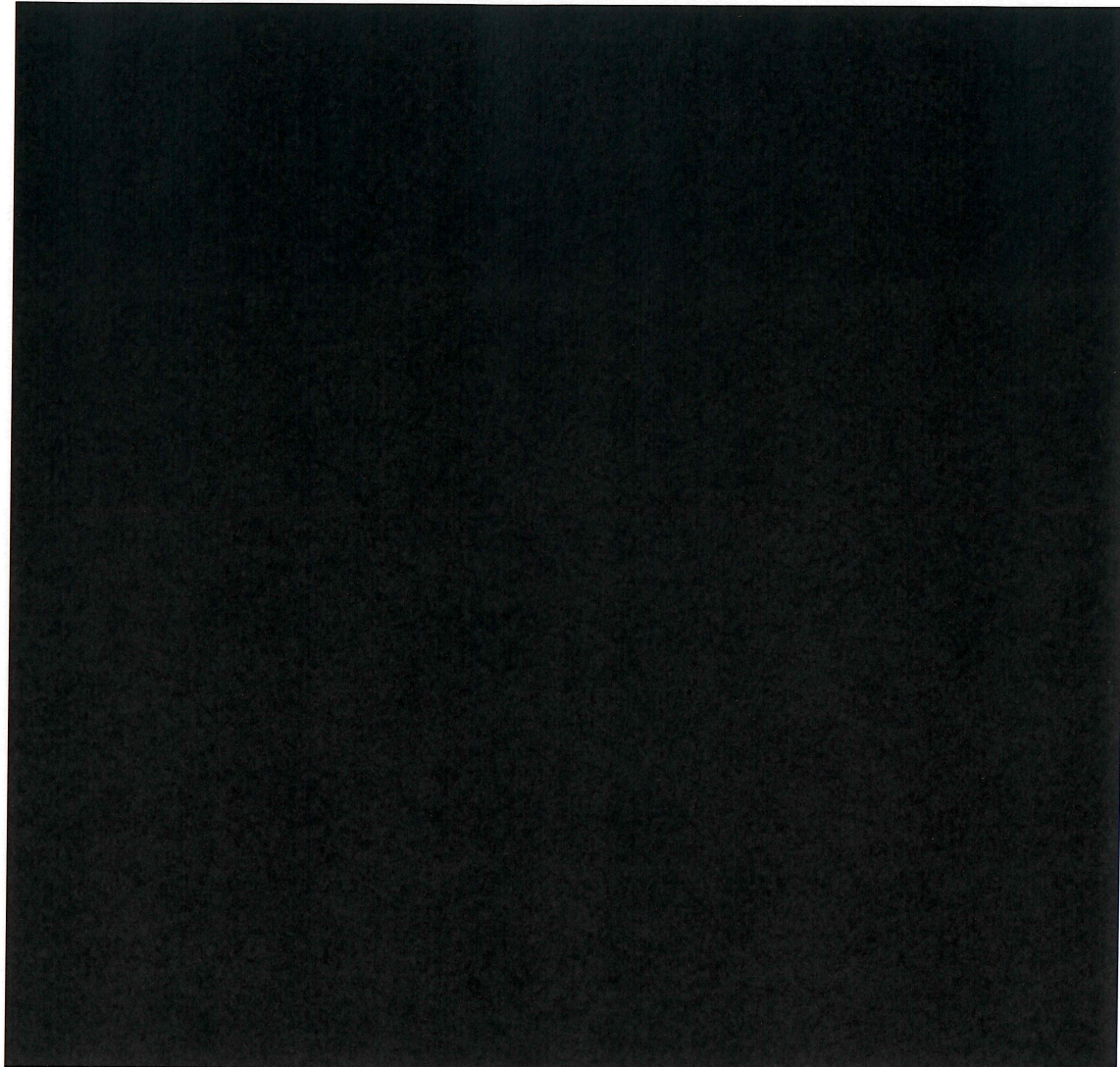


[REDACTED]

Mr. Ullmann provided a legal update. Mr. Ullmann discussed some recent and on-going talc litigation, [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]



There being no further business to come before the Board, upon motion duly made, and seconded, the meeting was adjourned at approximately 2:50 p.m.

Matthew. C. Orlando
Worldwide Vice President Corporate Governance
Corporate Secretary